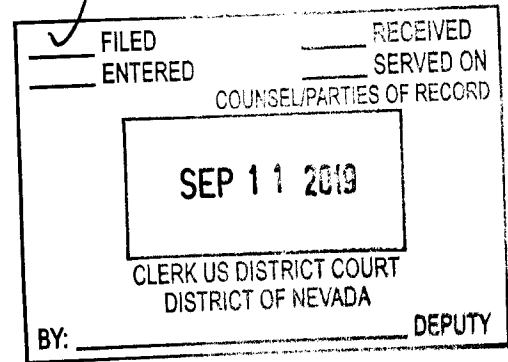


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William Kablitz, Alan Lima, Dominick Martucci, E.K. McDaniel,  
Valaree Olivas, William Sandie, Richard Snyder, James Stogner,  
Roger Terance, Kim Thomas, Joy Walsh, Harold Wickham and Catherine Yup*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

*ORDER*

JOSEPH M. ANDERSON,

Plaintiff,

v.

JAMES DZURENDA, et al.,

Defendants.

Case No. 3:18-cv-00426-MMD-CBC

**MOTION FOR EXTENSION OF TIME TO  
COMPLETE DISCOVERY PROPOUNDED  
TO DEFENDANT ARANAS**

Defendants, Kim Adamson, Romeo Aranas, Veronica Austin, Renee Baker, Susan Baros, Francisco Bautista, Dwayne Baze, Quentin Byrne, David Carpenter, Tara Carpenter, Ian Carr, Anthony Carrasco, Jeffrey Chandler, Nichole Cordova, James "Greg" Cox, Scott Davis, Russell Donnelly, James Dzurenda, Arwen Feather, Gilberto Florio-Ramirez, Sheryl Foster, Tim Garrett, Coralee Gorsline, Desiree Hultenschmidt, William Kablitz, Alan Lima, Dominick Martucci, E. K. McDaniel, Valaree Olivas, William Sandie, Richard Snyder, James Stogner, Roger Terance, Kim Thomas, Joy Walsh, Harold Wickham and Catherine Yup, by and through counsel, Aaron D. Ford, Attorney General of the State of Nevada, and Douglas R. Rands, Senior Deputy Attorney General, hereby move this Court for an

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1 extension of time to comply with discovery requests, Request for Admissions to Defendant Aranas,  
2 (Second Set) and Interrogatories to Defendant Aranas, (Second Set). This Motion is made and based upon  
3 Federal Rule of Civil Procedure 6(b)(1)(A), the attached Points and Authorities, the papers and pleadings  
4 on file herein, and such other and further information as this Court may deem appropriate.

5 **MEMORANDUM OF POINTS AND AUTHORITIES**

6 **I. ARGUMENT**

7 Defendants respectfully request an extension of time out from the current deadline (September  
8 13, 2019) to respond to Plaintiff's Discovery in this case. Plaintiff has served multiple requests for  
9 admissions on the Defendants. The new due date for that discovery would be October 13, 2019. The  
10 Defendants respectfully request an extension, until that date, for responses to the Requests for  
11 Admissions to Defendant Aranas (Second Set) and Interrogatories to Defendant Aranas (Second Set).  
12 (See Exhibit 1 and 2).

13 Defense counsel submits that he is not able to complete this discovery in the statutory time  
14 frame. In addition to the multiple discovery requests propounded by Plaintiff in this matter, Counsel is  
15 not able to confer with his client, Dr. Aranas, to prepare the responses at this time. Dr. Aranas is  
16 currently out of the country on a pre-planned vacation. (See Declaration of Counsel, attached as Exhibit  
17 3). As such, he is not available to participate in appropriately answering the discovery in this matter.  
18 Therefore, the Defendants request additional time to respond.

19 Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

20 When an act may or must be done within a specified time, the court may,  
21 for good cause, extend the time: (A) with or without motion or notice if  
22 the court acts, or if a request is made, before the original time or its  
extension expires; or (B) on motion made after the time has expired if the  
party failed to act because of excusable neglect.

23 Defendants' request is timely and will not hinder or prejudice Plaintiff's case, but will allow for a  
24 thorough opportunity to respond to the discovery requests. The requested extension of time should  
25 permit the parties time to adequately research draft, and submit discovery in this case. Defendants  
26 assert that the requisite good cause is present to warrant the requested extension of time. Therefore, the

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1 Defendants request an extension, until October 13, 2019, to respond to Plaintiff's Requests for  
2 Admissions to Defendant Aranas (Second Set) and Interrogatories to Defendant Aranas, (Second Set).  
3 By that date, Counsel should have access to his client to complete the discovery.

4 DATED this 10th day of September, 2019.

5 AARON D. FORD  
6 Attorney General

7 By:

  
8 DOUGLAS R. RANDS, Bar No. 3572  
9 Senior Deputy Attorney General

10  
11 IT IS SO ORDERED

12   
13 U.S. MAGISTRATE JUDGE

14 DATED: 9/11/2019